

STATEMENT OF BASIS
Colonial Pipeline Company
Baton Rouge Junction
LPDES Permit LA0051144
AI No. 27646

Draft Louisiana Pollutant Discharge Elimination System permit to discharge to waters of the State of Louisiana.

THE PERMITTEES ARE: Colonial Pipeline Company - Baton Rouge Junction involved with the transporting and storing of refined petroleum.

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 82135
Baton Rouge, Louisiana 70884-2135

PREPARED BY: Valerie Powe

DATE PREPARED: June 16, 2009

I. PERMIT STATUS

A. Reason For Permit Action:

Proposed reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a five year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46*. Upon the effective date, this permit shall replace the previously effective LPDES permit LA0051144.

* In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX.Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

B. LPDES permit: LA0051144
LPDES permit effective date: October 1, 2003
LPDES permit modification effective date: July 1, 2008
LPDES permit expiration date: September 30, 2008

The LPDES permit expired on September 30, 2008. The facility submitted a request for an extension of its permit renewal application dated June 24, 2008. The extension was approved; therefore, the permit was administratively continued.

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II. FACILITY INFORMATION

A. FACILITY TYPE – refined petroleum pipeline with refined oil storage

B. APPLICANT ACTIVITY-

Colonial Pipeline Company - Baton Rouge Junction is an existing facility that transports and stores refined petroleum product. This facility does not manufacture any products. The discharges from the facility are stormwater runoff, equipment washwater, fire system test, and treated sanitary wastewaters.

C. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4613

D. LOCATIONS – 1476 Highway 61 South, South of St. Francisville, East Feliciana Parish. (Latitude: 30° 43' 08" Longitude: 91° 16' 25")

E. FACILITY EFFLUENT FLOW – 126,020 GPD

III. RECEIVING WATERS

STREAM: Mississippi River via Thompson Creek, Sandy Creek, retention ponds, and an open ditch at facility (Outfalls 001, 002, and 102). Mississippi River via an unnamed marsh area, an unnamed ditch, and an open ditch at the facility (Outfalls 004, 005, and 006)

BASIN AND SEGMENT: Mississippi River Basin, Segment 070502

DESIGNATED USES: a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

IV. OUTFALL INFORMATION

Outfall 001

- A. Discharge Type: Intermittent discharge of stormwater runoff from the west side of Tank Farm No. 1 and the grassy areas south of Tank Farm No. 1, equipment washwater, and fire system test water
- B. Treatment: oil/water separator
- C. Location: at the point of discharge from the southeast corner of Retention Pond No. 1 (Latitude 30° 42' 37.4", Longitude 91° 17' 9.6")
- D. Flow: Stormwater – 58,200 GPD (30.1 acres)

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Equipment washdown water – 600 GPD
Fire system test water – 600 GPD

- E. Receiving Waters: Mississippi River via Thompson Creek, Sandy Creek, Retention Pond No. 1, and an open ditch at facility.
- F. Basin and Subsegment: 070502

Outfall 002

- A. Discharge Type: Intermittent discharge of stormwater runoff from the east side of Tank Farm No. 1, Manifold Area No. 1, equipment washwater, fire system test water, and treated sanitary wastewater from Internal Outfall 102
- B. Treatment: Oil/water separator
- C. Location: at the point of discharge from south side of Retention Pond No. 2 (Latitude 30° 42' 34.1", Longitude 91° 17' 04")
- D. Flow: Stormwater - 29,100 GPD
Equipment washdown water – 300 GPD
Fire system test water – 300 GPD
- E. Receiving Waters: Discharge Route: Mississippi River via Thompson Creek, Sandy Creek, Retention Pond No. 2, and an open ditch at facility
- F. Basin and Segment: 070502

Outfall 102

- A. Discharge Type: Intermittent discharge of treated sanitary wastewater
- B. Treatment: sewage treatment plant
- C. Location: at the point of discharge from treatment unit (Latitude 30° 42' 38", Longitude 91° 17' 01")
- D. Flow: Intermittent 2,800 GPD
- E. Receiving Waters: Mississippi River via Final Outfall 002
- F. Basin and Segment: 070502

Outfall 003 Deleted

Outfall 004

- A. Discharge Type: intermittent discharge of treated sanitary wastewater
- B. Treatment: sewage treatment plant

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- C. Location: At the point of discharge behind the warehouse on the north side of the facility (Latitude 30° 43' 13", Longitude 91° 16' 34")
- D. Flow: 7,200 GPD
- E. Receiving Waters: Mississippi River via an unnamed Marsh Area, an unnamed ditch, and an open ditch at facility
- F. Basin and Segment: 070502

Outfall 005

- A. Discharge Type: : intermittent discharge treated sanitary wastewater
- B. Treatment: sanitary treatment plant
- C. Location: At the point of discharge near the office building on the north side of the facility (Latitude 30° 43' 12.2", Longitude 91° 16' 36")
- D. Flow: 4,320 GPD
- E. Receiving Waters: Mississippi River via an unnamed Marsh Area, an unnamed ditch, and an open ditch at facility
- F. Basin and Segment: 070502

Outfall 006

- A. Discharge Type: intermittent discharge of stormwater runoff from laydown yard
- B. Treatment: None
- C. Location: At the point of discharge behind the maintenance area on the north side of the facility (Latitude 30° 43' 13", Longitude 91° 16' 35")
- D. Flow: 22,690 GPD
- E. Receiving Waters: Mississippi River via an unnamed Marsh Area, an unnamed ditch, and an open ditch at facility
- F. Basin and Segment: 070502

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V. PROPOSED CHANGES FROM PREVIOUS PERMIT

There are no proposed changes to this permit.

VI. PERMIT LIMIT RATIONALE

The following sections set forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

Outfall 001- Intermittent discharge of stormwater runoff from the west side of Tank Farm No. 1 and the grassy area south of tank farm, equipment washwater, and fire system test water

Parameter	Monthly Average	Daily Maximum	Frequency	Sample Type
Flow	Report	Report	1/3 months	Estimate
TOC	---	50 mg/L	1/3months	Grab
Oil & Grease	---	15 mg/L	1/3 months	Grab
pH	6.0 min	9.0 max	1/3 months	Grab

Site-Specific Consideration(s)

Flow: established in accordance with LAC 33:IX.2707.1.1.b. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

TOC: effluent limitations are consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

Oil and Grease: effluent limitations are consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

pH: effluent limitations are established in accordance with LAC33:IX.1113.C.1. Ph shall be monitored 1/quarter. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

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Outfall 002- Intermittent discharge of stormwater runoff from the east side of Tank Farm No. 1, Manifold Area No. 1, equipment washwater, fire system test water, and treated sanitary wastewater from Internal Outfall 102

Parameter	Monthly Average	Daily Maximum	Frequency	Sample Type
Flow	Report	Report	1/3 months	Estimate
TOC	---	50 mg/L	1/3 months	Grab
Oil & Grease	---	15 mg/L	1/3 months	Grab
pH	6.0 min	9.0 max	1/3 months	Grab

Site-Specific Consideration(s)

Flow: established in accordance with LAC 33:IX.2707.I.1.b. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

TOC: effluent limitations are consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

Oil and Grease: effluent limitations are consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

pH: effluent limitations are established in accordance with LAC33:IX.1113.C.1. Ph shall be monitored 1/quarter. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

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Internal Outfall 102- Intermittent discharge of treated sanitary wastewater

Parameter	Monthly Average	Weekly Average	Frequency	Sample Type
Flow	Report	Report	1/6 months	Estimate
BOD ₅	30 mg/L	45 mg/L	1/6 months	Grab
TSS	30 mg/L	45 mg/L	1/6 months	Grab
Fecal Coliform	200 colonies/100ml	400 colonies/100ml	1/6 months	Grab

Site-Specific Consideration(s)

Flow: established in accordance with LAC 33:IX.2707.1.1.b. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

BOD₅: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and permitted facilities with similar operations at a frequency of 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

TSS: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and permitted facilities with similar operations at a frequency of 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

Fecal Coliform: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and permitted facilities with similar operations at a frequency of 1/6 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

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Outfall 004- Intermittent discharge of treated sanitary wastewater

Parameter	Monthly Average	Weekly Average	Frequency	Sample Type
Flow	Report	Report	1/3 months	Estimate
BOD ₅	30 mg/L	45 mg/L	1/3 months	Grab
TSS	30 mg/L	45 mg/L	1/3 months	Grab
Fecal Coliform	200 colonies/100ml	400 colonies/100ml	1/3 months	Grab
pH	6.0 min	9.0 max	1/3 months	Grab

Site-Specific Consideration(s)

Flow: established in accordance with LAC 33:IX.2707.1.1.b. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

BOD₅: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and Best Professional Judgment (BPJ) at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

TSS: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and Best Professional Judgment (BPJ) at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

Fecal Coliform: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 Best Professional Judgment (BPJ) at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

pH: effluent limitations are established in accordance with LAC33:IX.1113.C.1 and shall be monitored at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

The monitoring frequency of 1/3 months will remain the same as the current permit due to continued Fecal Coliform and TSS permit exceedances. (See Section VIII, Compliance History/Comments)

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Outfall 005- Intermittent discharge of treated sanitary wastewater

Parameter	Monthly Average	Weekly Average	Frequency	Sample Type
Flow	Report	Report	1/3 months	Estimate
BOD ₅	30 mg/L	45 mg/L	1/3 months	Grab
TSS	30 mg/L	45 mg/L	1/3 months	Grab
Fecal Coliform	200 colonies/100ml	400 colonies/100ml	1/3 months	Grab
pH	6.0 min	9.0 max	1/3 months	Grab

Site-Specific Consideration(s)

Flow: established in accordance with LAC 33:IX.2707.I.1.b. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

BOD₅: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and Best Professional Judgment (BPJ) at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

TSS: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and Best Professional Judgment (BPJ) at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

Fecal Coliform: effluent limitations are consistent with LPDES Class I Sanitary General Permit, LAG530000 and Best Professional Judgment (BPJ) at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

pH: effluent limitations are established in accordance with LAC33:IX.1113.C.1 and shall be monitored at a frequency of 1/3 months. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

The monitoring frequency of 1/3 months will remain the same as the current permit due to continued Fecal Coliform and TSS exceedances. (See Section VIII, Compliance History/Comments)

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Outfall 006- Intermittent discharge of stormwater runoff from laydown yard

Parameter	Monthly Average	Daily Maximum	Frequency	Sample Type
Flow	Report	Report	1/3 months	Estimate
TOC	---	50 mg/L	1/3 months	Grab
Oil & Grease	---	15 mg/L	1/3 months	Grab
pH	6.0 min	9.0 max	1/3 months	Grab

Site-Specific Consideration(s)

Flow: established in accordance with LAC 33:IX.2707.I.1.b. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

TOC: effluent limitations are consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

Oil and Grease: effluent limitations are consistent with the Multi-Sector General Permit and Best Professional Judgment (BPJ) at a frequency of 1/quarter. These requirements will be retained from the administratively continued LPDES permit, effective October 1, 2003.

pH: effluent limitations are established in accordance with LAC 33:IX.1113.C.1. Ph shall be monitored 1/quarter. These requirements have been retained from the administratively continued LPDES permit, effective October 1, 2003.

VII. TMDL Waterbodies

Outfalls 001, 002, 102, 004, 005, and 006

The discharges from Outfalls 001, 002, 102, 004, 005, and 006 (stormwater runoff, equipment washdown wastewater, fire systems test water, and sanitary wastewater) are to an open ditch at the facility, thence into Retention Pond No. 1, thence into Sandy Creek, thence into Thompson Creek, and thence into the Mississippi River (Outfall 001); an open ditch at the facility, thence into Retention Pond No. 2, thence into Sandy Creek, thence to Thompson Creek, and thence into the Mississippi River (Outfalls 002 and 102); an open ditch at the facility into an unnamed ditch, thence to an unnamed marsh area, and thence into the Mississippi River (Outfalls 004 and 005); an open ditch at the facility into an unnamed ditch, thence to an unnamed marsh area, and thence into the Mississippi River (Outfall 006).

Subsegment 070502, Thompson Creek, Mississippi River, is on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators. To date, no TMDLs have been completed for this waterbody. The target completion date for the TMDL is March 31, 2010. The discharges from Outfalls 004 and 005 do have the potential to contribute to impairments caused by pathogen indicators. Therefore, the effluent limitations for fecal coliform proposed by the permit have been established to ensure that the integrity of the waterbody is maintained. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent

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limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Mississippi River Basin, those suspected causes for impairment which are not directly attributed to the petroleum pipeline point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

VIII. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

A Notice of Deficiency Letter, dated October 20, 2004, was issued to Colonial Pipeline, based on a compliance evaluation inspection, on September 21, 2004 for two TSS exceedances. The permit limit for TSS is 45mg/L and the reported values were 155 and 415 mg/L. In February of 2004, a contractor was hired by Colonial to replace the chlorinator and add a new chlorine contact chamber to the treatment unit. A Deficiency Clear Letter, dated December 10, 2004, was issued for adequately addressing the area of concern.

B. Inspections

An inspection conducted on September 21, 2004, noted the following:

1. A DMR review revealed two TSS exceedances,
2. There were no apparent violations at the facility, and
3. There were no solids nor oily sheen observed.

C. DMR Review/Excursions

A review of the Discharge Monitoring Reports (DMRs) from October 2006 to March 2009 revealed the following exceedances:

Date	Parameter	Outfall	Reported Value	Permit Limit
01-03/08	Fecal Coliform	005	1900 col/100ml	400 col/100ml
10-12/07	Fecal Coliform	005	600 col/100ml	400 col/100ml

IX. "IT" QUESTIONS - APPLICANT'S RESPONSES

This is an existing facility. IT questions were not required to be addressed.

X. ENDANGERED SPECIES

The receiving waterbody, Subsegment No. 070502 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as a threatened and/or endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The

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effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

XI. HISTORIC SITES

The discharge is from an existing facility. There should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XII. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to permit the discharges described in the application.

XIII. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List